

REMARKS

Rejection of claims 1-16, 21, 22, 27-30 is maintained under 35 U.S.C. § 103(a) as being unpatentable over the Kawano reference in view of the Birdwell reference. The method of claim 1 calls for enabling a first client in a set to determine whether a message is sent to the first client or to a subset of clients such that an individual identifier is assigned to a set of clients and a group identifier to a subset of clients within the set of clients.

For example, the bandwidth may be conserved in a broadcast network by delivering a single message packet to large sets of clients. Specific sets of clients may be managed in this way. Possible grouping strategies may be accomplished to target groups based on geographic location, culture, or language. A group filter can be applied to unique client identifiers to support the aggregation of multiple messages of the same type. In this way, a client group message may be defined which is sent to a subset of clients in a broadcast network. The broadcast network assigns them a specific IP multicast address and/or port on which to receive messages of a particular type because a traditional client-server application as taught in the Kawano and Birdwell references cannot be deployed in a broadcast network.

The Kawano and the Birdwell references considered either in combination or alone do not teach that a first client in the set of clients is enabled to determine whether a message is sent to the first client or to the subset of clients within the set of clients. The Examiner admits that this limitation is not taught by the Kawano reference. However, the Examiner cites to the Birdwell reference as teaching this limitation. The Birdwell reference teaches that clients filter the announcements according to predetermined criteria, keeping the announcements satisfying the criteria and discarding the rest. As such, a particular client is not enabled to determine whether a message is sent to this client or to the subset of clients within the set of clients. In other words, the Birdwell reference does not determine anything about the addressee of the message.

The Birdwell reference teaches that all clients simply monitor a criterion for announcements and keep the announcements which relate or are indicated to be associated with a particular client and discard the rest of the announcements. In this manner, each client is merely concerned about the announcements which are directed to itself, whereas in claim 1, a particular client is enabled to determine whether a message is sent to itself or to the subset of clients, i.e., to other clients of a set of clients. Absent such a determination by a single client to whom the

message is sent, the Birdwell reference fails to teach or suggest claim 1 limitations.

Accordingly, claim 1 is in condition for allowance. The claims that depend from claim 1 are also allowable because they depend from an independent claim which is patentably distinguishable over the cited art.

Claim 15 calls for a method including providing at least two agents on a client, assigning a different address to each of the agents, and determining whether a message received by the client is addressed to one of the agents. Neither of the Kawano or Birdwell references provide for at least two agents on a client, as claimed in claim 15. A different address is not assigned to each of the agents either and there is no teaching for determining whether a message received by the client is addressed to one of the two agents.

The Office Action cites to column 8, lines 27-44 in the Kawano reference. Instead of providing at least two agents on a client, in the cited portion of the Kawano reference, a plurality of ports are given a respective different address so that a transmission controller can perform frame transmitting or receiving operations. Since there is no provision for two agents on a particular client, a different address is not assigned to the agents as claimed in claim 15.

The Office Action further cites to column 6, lines 16-32 in the Birdwell reference for indicating that determining whether, a message received by the client, is addressed to one of the two agents. Specifically, the monitoring and listening feature of the Birdwell reference is cited for teaching this limitation. However, in column 6, lines 16-32, clients monitor the multicast address and destination port to receive the multicast packets containing the announcements. Again, there is no teaching or a suggestion as to whether a message received by the client is addressed to one of the two agents, as claimed in claim 15.

Therefore, the combination of Kawano and Birdwell references fail to render claim 15 limitations *prima facie* obvious to one of an ordinary skill in the relevant art. Based on the same rationale as applied to claims 1 and 15, independent claims 21 and 30 are also in condition for allowance. The Examiner is respectfully requested to consider all pending claims.

In view of these remarks, the application is now in condition for allowance and the Examiner's prompt action in accordance therewith is respectfully requested.

Respectfully submitted,



Date: April 6, 2004

---

Sanjeev K. Singh under 37 C.F.R. § 10.9(b)  
Registration No. 28,994  
TROP, PRUNER & HU, P.C.  
8554 Katy Freeway, Suite 100  
Houston, TX 77024  
713/468-8880 [Phone]  
713/468-8883 [Fax]

Customer No.: 21906